



November 13, 2024

VIA ECF
United States District Court
Honorable Lewis J. Liman
500 Pearl Street
New York, NY 10007

Re: Andrade-Barteldes v. ASA College, Inc., et al. – No. 1:23-cv-00495
Letter Motion to Adjourn Status Conference

Dear Judge Liman,

This firm represents the plaintiff Ernest Andrade-Barteldes and the collective/class in the above-referenced civil action. The undersigned submits this Letter Motion requesting an adjournment of the Status Conference before the Court scheduled for November 14, 2024 at 12:00 P.M. Defendant Jose Valencia and plaintiff, in his capacity as class representative, and Levine & Blit, PLLC, in its capacity as class counsel, have reached a resolution in principle whereby Mr. Valencia would provide a class list (including names and last known addresses) for class members to class counsel so that class notice may be distributed. Mr. Valencia has also agreed, in principle, to cooperate with class counsel in providing IRS W2's and information about the class members such as titles and email addresses and information concerning the assets of defendants ASA College, Inc., and Alexander Shchegol should a judgment on behalf of the collective/class be obtained. In exchange, plaintiff and class counsel have agreed, in principle, to dismiss with prejudice the claims against Mr. Valencia upon the Court's approval of the settlement agreement. The parties have drafted an agreement and are circulating for execution.

Class counsel anticipates filing a Motion for Preliminary Approval for the Settlement with Mr. Valencia and Approval of Class Notice with the Court within 30 days after receipt of the names and last known addresses from Mr. Valencia. As such, plaintiff respectfully requests that the Status Conference scheduled for November 14, 2024 is adjourned to mid-December 2024. This is the first request for such relief. Mr. Valencia has consented to this request. Thank you for the Court's time and attention to this matter.

Respectfully submitted,

LEVINE & BLIT, PLLC

A handwritten signature in black ink, appearing to read "Matthew J. Blit".

Matthew J. Blit

The conference previously scheduled for November 14, 2024 is adjourned to December 20, 2024 at 2PM. The Court will address the motion to substitute counsel, Dkt. No. 96, at that conference.

Dated: November 13, 2024

SO ORDERED.

A handwritten signature in black ink, appearing to read "LEWIS J. LIMAN".

LEWIS J. LIMAN
United States District Judge